Message

From: Traylor, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6D06C6B766C4B4B8BFDF6B0FEA4B998-TRAYLOR, PA]

Sent: 3/13/2019 7:19:50 PM

To: Leslie Sue Ritts [Iritts@rittslawgroup.com]

Subject: RE: NEDA/CAP Meeting on Friday March 15th at 10:30 am - People who are coming in Person! And potential topics

of discussion.

Thanks; using your number would be fine. See you then.

Patrick Traylor

Deputy Assistant Administrator Office of Enforcement and Compliance Assurance U.S. Environmental Protection Agency 202.809.8796 (m) 202.564.5238 (o)

From: Leslie Sue Ritts lritts@rittslawgroup.com

Sent: Wednesday, March 13, 2019 2:42 PM **To:** Traylor, Patrick <traylor.patrick@epa.gov>

Subject: NEDA/CAP Meeting on Friday March 15th at 10:30 am - People who are coming in Person! And potential topics

of discussion.

Hi Patrick -

We are looking forward to seeing you on Friday at 10:30 am. You had requested the names of people who will attend in person, which are provided directly below. I also listed those who have told me that they will participate by phone using NEDA/CAP's conferencing number unless you prefer an EPA number). Some possible meeting discussion items are listed at the very bottom.

The following NEDA/CAP members are planning to attend in person:

- Barbara Bankoff, for Eli Lilly
- Al Collins, Occidental Petroleum
- Rob Kaufmann Koch Public Sectors,
- Steve Lomax, Koch Public Sectors
- Meagan Ekstrom, Proctor & Gamble
- David Pavlich, Phillips 66
- Steve Higley, Marathon Petroleum
- Leslie Ritts, NEDA/CAP

(Unless you prefer to use an agency call-in number, let's go ahead and use NEDA/CAP's number, which is 916-233-0790, 916390# for participants and 312168# to open the line). I expect the following folks to participate by phone:

- Matt Iwicki, Boeing
- Ryan Gesser, Georgia Pacific
- Jennifer Cogswell, Koch Ag & Energy
- Anu Kunapuli, Merck
- Don Robin, Eli Lilly (tent.)
- Joe McCabe, Caterpillar
- Ken Comey and/or Mike Hopperton, BP America
- Greg Myers, Marathon Petroleum

<u>Issues I thought that we might talk about</u>, if acceptable to you, would include (1) status of the reorganization of the regional offices enforcement groups and whether there are any effects on procedures for referrals and complaints or outreach to states; (2) whether your priorities have changed since last summer when we last met and what it means that NSR has been removed from the national priority list; (3) the new national OECA priority for ammonia refrigerants, any updates to the RMP inspection manual, and OECA's use of the "general duty clause;" (4) whether OECA has any concerns over withdrawal of the "once in, always policy" by OAR; (5) any updates on last summer's concerns regarding tank emission factors; (6) the use of optical imaging and personal sensors and credible evidence issues; and (7) other NSR clarifications if we have time.

Best regards and many thanks for meeting with us,



Leslie Sue Ritts Ritts Law Group, PLLC 7330 Mallory Circle Alexandria, VA 22315 (703) 823-2292 (office) (703) 966-3862 (cell) Iritts@rittslawgroup.com

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law as attorney client and work-product confidential or otherwise confidential communications. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify us at the above telephone number.

From: Traylor, Patrick <traylor.patrick@epa.gov>

Sent: Friday, February 22, 2019 12:36 PM **To:** Leslie Sue Ritts rittslawgroup.com

Subject: RE: NEDA/CAP Meeting Request on March 15th between 10am and 3 pm

Leslie:

Let's meet at 10:30 a.m. on Friday, March 15. Please give me a final list of in-person participants as we get closer so we can pre-clear them through security. We'll be meeting in the South building.

Warm regards, Patrick

Patrick Traylor

Deputy Assistant Administrator Office of Enforcement and Compliance Assurance U.S. Environmental Protection Agency 202.809.8796 (m) 202.564.5238 (o)

From: Leslie Sue Ritts < lritts@rittslawgroup.com Sent: Wednesday, February 20, 2019 1:08 PM To: Traylor, Patrick traylor.patrick@epa.gov

Subject: RE: NEDA/CAP Meeting Request on March 15th between 10am and 3 pm

Wow, that was quick! And apologies, yes – you absolutely need a heads up about the companies that would attend:

BP America – James Nolan (DC), Ken Comey, PE (IL)

Boeing – Pete Pagano (With Matt Iwicki, Esq. on phone from Seattle)

Caterpillar - Either Kathleen Horchler, Esq. (IL) or Brad Stevenson, PE, (IL)

Eli Lilly - Possibly Don Robin, (IN/old IDEM alum) or Michael Chambers, Assoc. GC (IN)

Georgia Pacific – Ryan Gesser (GA)

Koch Industries – Likely both Rob Kaufmann and Steve Lomax (DC)

Merck – Anu Kunapuli, PE (phone from NJ)

Phillips 66 - Dave Pavlich, PE (OK)

Occidental Petroleum - Al Collins (DC)

Procter & Gamble – Maxine Dewbury (OH), maybe Sean Broderick (DC)

Solar Turbines - Leslie Witherspoon (CA)

LSR



Leslie Sue Ritts Ritts Law Group, PLLC 7330 Mallory Circle Alexandria, VA 22315 (703) 823-2292 (office) (703) 966-3862 (cell) Iritts@rittslawgroup.com

Please note newmail address

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law as attorney client and work-product confidential or otherwise confidential communications. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify us at the above telephone number.

From: Traylor, Patrick < traylor.patrick@epa.gov Sent: Wednesday, February 20, 2019 12:56 PM
To: Leslie Sue Ritts trits@rittslawgroup.com Cc: Loving, Shanita Loving.Shanita@epa.gov

Subject: RE: NEDA/CAP Meeting Request on March 15th between 10am and 3 pm

Leslie, good to hear from you. Let me run this around the office. In the meantime, would you let me know which NEDA/CAP members might attend?

Patrick Traylor

Deputy Assistant Administrator Office of Enforcement and Compliance Assurance U.S. Environmental Protection Agency 202.809.8796 (m) 202.564.5238 (o) From: Leslie Sue Ritts < liritts@rittslawgroup.com Sent: Wednesday, February 20, 2019 12:42 PM To: Traylor, Patrick lirits@epa.gov Cc: Loving, Shanita lirits@epa.gov >

Subject: NEDA/CAP Meeting Request on March 15th between 10am and 3 pm

Dear Patrick,

NEDA/CAP's members would like to come and meet with you about the reorganization of the enforcement function in the regions, enforcement priorities, and your priorities in 2019. Our next DC meeting (actually we were debating OAQPS, but hands down, you won if you are available) is on March 15th? Might you be willing to meet with us for about an hour?

Hope you are enjoying a snow day! And many thanks,

(48K)

Leslie Sue Ritts Ritts Law Group, PLLC 7330 Mallory Circle Alexandria, VA 22315 (703) 823-2292 (office) (703) 966-3862 (cell) Iritts@rittslawgroup.com

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law as attorney client and work-product confidential or otherwise confidential communications. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, immediately notify us at the above telephone number.